## UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY, MARISSA BLAIR, APRIL MUÑIZ, MAR-CUS MARTIN, NATALIE ROMERO, CHEL-SEA ALVARADO, JOHN DOE, and THOMAS BAKER,

Plaintiffs,

V.

JASON KESSLER, RICHARD SPENCER, CHRISTOPHER CANTWELL, JAMES ALEX FIELDS, JR., VANGUARD AMER-ICA, ANDREW ANGLIN, MOONBASE HOLDINGS, LLC, ROBERT "AZZMADOR" RAY, NATHAN DAMIGO, ELLIOTT KLINE a/k/a ELI MOSLEY, IDENTITY EVROPA, MATTHEW HEIMBACH, MAT-THEW PARROTT a/k/a DAVID MATTHEW PARROTT, TRADITIONALIST WORKER PARTY, MICHAEL HILL, MICHAEL TUBBS, LEAGUE OF THE SOUTH, JEFF SCHOEP, NATIONAL SOCIALIST MOVE-MENT, NATIONALIST FRONT, AUGUS-TUS SOL INVICTUS, FRATERNAL ORDER OF THE ALT-KNIGHTS, LOYAL WHITE KNIGHTS OF THE KU KLUX KLAN, and EAST COAST KNIGHTS OF THE KU KLUX KLAN a/k/a EAST COAST KNIGHTS

Civil Action No. 3:17-cv-00072-NKM

**JURY TRIAL DEMANDED** 

Defendants.

## MOTION FOR RECONSIDERATION OF ORDER GRANTING PLAINTIFFS' MOTION TO COMPEL DISCOVERY FROM DEFENDANT SCHOEP

Defendant Jeff Schoep, by and through counsel, respectfully moves, pursuant to Federal Rules of Civil Procedure 54(b), 59(c), and 60(b), for reconsideration of the Court's May 27, 2020 Memorandum and Order, ECF No. 741, granting, in its entirety, Plaintiffs' Motion to Compel Discovery from Defendant Jeff Schoep, ECF No. 689.

Defendant Schoep respectfully requests ask that the Court reconsider its Order granting Pls'
Mot. to Compel for the reasons set forth in the forthcoming Memorandum in Support of
Defendant Schoep's Motion for Reconsideration.

Dated: May 28, 2020

Respectfully Submitted,

/s/ W. Edward ReBrook, IV W. Edward ReBrook, IV (VSB 84719) The ReBrook Law Office 6013 Clerkenwell Court Burke, VA 22015 Mobile: 571.215.9006

Email: Edward@ReBrookLaw.com

## CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2020, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

Roberta A. Kaplan (pro hac vice)
Julie E. Fink (pro hac vice)
Gabrielle E. Tenzer (pro hac vice)
Michael L. Bloch (pro hac vice)
KAPLAN HECKER & FINK LLP
350 Fifth Avenue, Suite 7110
New York, NY 10118
Telephone: (212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
gtenzer@kaplanhecker.com
mbloch@kaplanhecker.com

Karen L. Dunn (pro hac vice)
Jessica E. Phillips (pro hac vice)
William A. Isaacson (pro hac vice)
BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, NW
Washington, DC 20005
Telephone: (202) 237-2727
Fax: (202) 237-6131
kdunn@bsfllp.com
jphillips@bsfllp.com
wisaacson@bsfllp.com

Yotam Barkai (*pro hac vice*) BOIES SCHILLER FLEXNER LLP 55 Hudson Yards New York, NY 10001 Telephone: (212) 446-2300 Fax: (212) 446-2350 ybarkai@bsfllp.com

Alan Levine (pro hac vice)
Philip Bowman (pro hac vice)
COOLEY LLP
55 Hudson Yards
New York, NY 10001
Telephone: (212) 479-6260
Fax: (212) 479-6275
alevine@cooley.com
pbowman@cooley.com

David E. Mills (pro hac vice)
Joshua M. Siegel (VSB 73416)
COOLEY LLP
1299 Pennsylvania Avenue, NW
Suite 700
Washington, DC 20004
Telephone: (202) 842-7800
Fax: (202) 842-7899
dmills@cooley.com
jsiegel@cooley.com

J. Benjamin Rottenborn (VSB 84796) WOODS ROGERS PLC 10 South Jefferson St., Suite 1400 Roanoke, VA 24011 Telephone: (540) 983-7600 Fax: (540) 983-7711 brottenborn@woodsrogers.com Counsel for Plaintiffs

Elmer Woodard
5661 US Hwy 29
Blairs, VA 24527
isuecrooks@comcast.net
James E. Kolenich
Kolenich Law Office
9435 Waterstone Blvd. #140
Cincinnati, OH 45249
jek318@gmail.com
Counsel for Defendants Jason Kessler,
Nathan Damigo, Identity Europa, Inc.
(Identity Evropa), Matthew Parrott, and
Traditionalist Worker Party

John A. DiNucci
Law Office of John A. DiNucci
8180 Greensboro Drive, Suite 1150
McLean, VA 22102
dinuccilaw@outlook.com
Counsel for Defendant Richard Spencer

Justin Saunders Gravatt
David L. Campbell
Duane, Hauck, Davis & Gravatt, P.C.
100 West Franklin Street, Suite 100
Richmond, VA 23220
jgravatt@dhdglaw.com
dcampbell@dhdglaw.com
Counsel for Defendant James A. Fields, Jr.

Bryan Jones 106 W. South St., Suite 211 Charlottesville, VA 22902 bryan@bjoneslegal.com Counsel for Defendants Michael Hill, Michael Tubbs, and League of the South

I further hereby certify that on May 28, 2020, I also served the following non-ECF participants, via electronic mail, as follows:

Christopher Cantwell <a href="mailto:christopher.cantwell@gmail.com">christopher.cantwell@gmail.com</a>

Vanguard America c/o Dillon Hopper dillon hopper@protonmail.com

Robert Azzmador Ray <a href="mailto:azzmador@gmail.com">azzmador@gmail.com</a>

Elliott Kline a/k/a Eli Mosley eli.f.mosley@gmail.com deplorabletruth@gmail.com

Matthew Heimbach matthew.w.heimbach@gmail.com

## /s/ W. Edward ReBrook, IV

W. Edward ReBrook, IV (VSB 84719) The ReBrook Law Office 6013 Clerkenwell Court Burke, VA 22015

Mobile: 571.215.9006

Email: Edward@ReBrookLaw.com